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listed on signature pages]

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
(SAN FRANCISCO DIVISION)

IN RE TFT-LCD (FLAT PANEL)  
ANTITRUST LITIGATION

Case No. 3:07-md-1827 SI; MDL 1827  
Individual Case No. 3:10-cv-0117 SI

This Document Relates To Individual Case No.:  
3:10-cv-0117 SI

ELECTROGRAPH SYSTEMS, INC.;  
ELECTROGRAPH TECHNOLOGIES, CORP.

Plaintiffs,

v.

EPSON IMAGING DEVICES CORPORATION,  
et al.

Defendants.

**STIPULATION AND ~~[PROPOSED]~~  
ORDER REGARDING DEADLINES  
FOR DEPOSITIONS**

**Honorable Susan Illston**

Plaintiffs Electrograph Systems, Inc. and Electrograph Technologies, Corp. (collectively,  
“Electrograph”) and Defendants Hitachi, Ltd., Hitachi Electronic Devices (USA), Inc., Hitachi  
Displays, Ltd. (n/k/a Japan Display East, Inc.), Epson Imaging Devices Corporation, Epson

1 Electronics America, Inc., Sharp Corporation, Sharp Electronics Corporation, Toshiba  
 2 Corporation, Toshiba America Electronic Components, Inc., Toshiba America Information  
 3 Systems, Inc., Toshiba Mobile Display Co., Ltd., LG Display Co., Ltd., LG Display America,  
 4 Inc., AU Optronics Corporation, AU Optronics Corporation America, Mitsui & Co. (Taiwan),  
 5 Ltd., and HannStar Display Corporation (collectively, “Stipulating Defendants”), hereby stipulate  
 6 as follows:

### 7 STIPULATION

8 WHEREAS, fact discovery was set to close in this case on December 8, 2011, pursuant to  
 9 the Stipulation and Order Modifying Pretrial Schedule for “Track One” Direct Action Plaintiff  
 10 and State Attorney General Actions (Dkt. No. 3110, the “Scheduling Order”);

11 WHEREAS, on February 17, 2012, the Court entered an order approving a stipulation  
 12 extending the time for Stipulating Defendants to take the depositions of former Electrograph  
 13 employees until March 30, 2012 (Dkt. No. 4835);

14 WHEREAS, on March 5, 2012, the Court entered an order approving a stipulation  
 15 extending the time for Stipulating Defendants to take the depositions of former Electrograph  
 16 employees until April 30, 2012 (Dkt. No. 5025);

17 WHEREAS, on April 24, 2012, the Court entered an order approving a stipulation  
 18 extending the time for Stipulating Defendants to take the depositions of former Electrograph  
 19 employees until May 14, 2012 (Dkt. No. 5512);

20 WHEREAS former Electrograph employees Rabih (Robbie) Chikhani and Mohammed  
 21 (Mike) El-Ahmar are unavailable for depositions prior to May 14, 2012;

22 WHEREAS Stipulating Defendants would benefit from additional time to conduct the  
 23 depositions of former Electrograph employees Rabih (Robbie) Chikhani and Mohammed (Mike)  
 24 El-Ahmar;

25 WHEREAS Electrograph and Stipulating Defendants agree to the extension of the close  
 26 of fact discovery set forth in the Scheduling Order for the limited purpose of providing sufficient  
 27 time for Stipulating Defendants to take the depositions of former Electrograph employees Rabih  
 28 (Robbie) Chikhani and Mohammed (Mike) El-Ahmar;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the undersigned counsel, on behalf of their respective clients, Electrograph, on the one hand, and Stipulating Defendants on the other hand, that the deadline for Stipulating Defendants to take the depositions of former Electrograph employees is extended to June 11, 2012.

Dated: May 14, 2012

By: /s/ Kent M. Roger

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**FILER'S ATTESTATION**

I, Kent M. Roger, am the ECF user whose identification and password are being used to file this Stipulation and [Proposed] Order. In compliance with General Order 45.X.B, I hereby attest that Kevin McCann, Christopher Nedeau, Melvin Goldman, Hugh Bangasser, John Grenfell, John Chung, Paul Eyre and Philip Iovieno concur in this filing.

/s/ Kent M. Roger


Kent M. Roger

*Attorneys for Defendants Hitachi, Ltd., Hitachi Displays, Ltd., and Hitachi Electronic Devices (USA), Inc.*

**[PROPOSED] ORDER**

Pursuant to the parties' stipulation set forth above and pursuant to Rule 6-1(a) of the Civil  
Local Rules, IT IS SO ORDERED.

Dated: May 16, 2012

By   
HON. SUSAN ILLSTON  
UNITED STATES DISTRICT JUDGE